BEFORE THE COMMISSIONER OF SECURITIES AND INSURANCE, OFFICE OF THE MONTANA STATE AUDITOR

IN THE MATTER OF JEAN-LOUIS, TERVELENS, License No. 3002606731, NPN 19962751, and PACECCA, JULIAN, License No. 3002723342, NPN 20845022 Respondents.	Case No. INS-2026-00007 **FINAL AGENCY ACTION & DEFAULT ORDER**

On June 19, 2026, counsel for the Commissioner of Securities and Insurance, Office of the Montana State Auditor (Commissioner or CSI), issued a Notice of Proposed Agency Action and Opportunity for Hearing (Notice or NOPAA) concerning Respondents Tervelens Jean-Louis and Julian and Pacecca, a copy of which is posted on the CSI website. CSI served the NOPAA on Respondents via U.S. Mail with tracking capability and via email. The mailed copies of the NOPAA were received on June 29, 2026

The NOPAA explained that if Respondents disputed the allegations in the NOPAA, they must request an administrative hearing within 24 days. The NOPAA also warned that if Respondent failed to request a hearing, the Commissioner would issue a final order by default imposing the penalty stated in the NOPAA. Respondent failed to respond and request a hearing by the deadline; therefore, the Commissioner issues the following final order.

The Commissioner considered the evidence and exhibits and makes the following determinations:

FINDINGS OF FACT

1. Respondent Jean-Louis is licensed as an insurance producer in Montana, license # 3002606731, NPN 20845022.

2. Respondent Pacecca is licensed as an insurance producer in Montana, license # 3002723342, NPN 19962751.

3. Throughout 2024, M.G., a Montana resident, had health insurance through his employer. However, his 2024 income taxes were returned to him as incorrect due to a Form 1095-A.

4. Form 1095-A is the form used for reporting to the Internal Revenue Service when an individual is enrolled in a health insurance policy sold through federal Marketplace. The Marketplace, not the individual, submits the Form 1095-A to the IRS.

5. M.G. learned that Health Care Service Corporation, an Illinois Mutual Legal Reserve Company conducting business in Montana as Blue Cross Blue Shield of Montana ("BCBS") had issued the health insurance policy and Jean-Louis was the listed producer.

6. On March 03, 2025, M.G. submitted a fraud referral to CSI, which was investigated by Investigator Rodney Harker.

7. Investigator Harker established that the application did not include M.G.'s apartment number on his street address and listed a long-outdated phone number.

8. The application was submitted on February 9, 2024, using Jean-Louis's national producer number ("NPN"), 19962751. The policy was automatically renewed on October 13, 2024.

9. M.G. never gave anyone permission or consent to obtain the BCBS insurance policy. M.G. noted he has never heard from Respondent, never spoken to Respondent, and has no idea who Respondent is.

10. On March 2, 2025, M.G. canceled the policy. In total, the premium for the policy was $696.99, which was paid for using the federal premium tax credit of $696.99, thus the policy was entirely paid for by federal taxpayers.

11. BCBS requested a statement from Jean-Louis along with any supporting documentation to indicate M.G. did in fact consent to the enrollment coverage. Jean-Louis was unable to provide any documentation that M.G. had consented to obtain the insurance policy.

12. As a result, BCBS terminated the policy due to fraudulent enrollment.

13. In a written statement provided to CSI dated November 19, 2025, Jean-Louis explained: "Agent Julian Pacecca (NPN: 20845022) was the licensed agent that spoke with and enrolled [M.G.]. I, Tervelens Jean-Louis (NPN: 19962751), was the Agent of Record due to an NPN Override."

14. In a "HCSC Corrective Action Form" signed by Jean-Louis on April 4, 2025, BCBS found the allegation that M.G. had been enrolled without his knowledge was "Founded."

15. On March 31, 2025, Pacecca signed an "Agent Response Statement" and stated, "I am confident that I obtained [M.G.'s] consent before proceeding with the enrollment." Pacecca added that "[r]egrettably, due to technical difficulties with our dialer system that temporarily suspended the recording function, we were unable to locate the enrollment recording."

16. The HCSC Corrective Action Form explains that Jean-Louis took the following correct action against Pacecca: "In response to [M.G.'s] complaint, I spoke with Agent Julian Pacecca face to face. During our meeting, the complaint was addressed. I also stressed the importance of adhering to our call script, as well as the importance of obtaining consent from consumers during all interactions. Julian was an active participant in the meeting, acknowledging the concerns raised. To ensure accountability and continuous improvement, we have aligned on actionable steps, including closer monitoring of call compliance and additional coaching sessions to reinforce best practices."

CONCLUSIONS OF LAW

17. The Commissioner is tasked with enforcement of the Montana Insurance Code, including the § 33-1-317 and 33-1-1201, et seq., MCA.

18. If, after conducting a hearing under § 33-1-701, MCA, the Commissioner determines that a person has committed administrative or civil insurance fraud, the Commissioner may impose a penalty. § 33-1-317, MCA. That fine can be up to $ 5,000 per violation for insurance producers or adjusters. § 33-1-317, MCA. Additionally, the

Commissioner is required to order that the person make restitution to any person for all financial loss sustained as a result of the insurance fraud. § 33-1-1211, MCA.

19. A person commits the act of administrative insurance fraud under § 33-1-1202(3), MCA when the person presents or causes to be presented to or by an insurer, purported insurer, producer, or administrator a materially false or altered application of insurance § 33-1-1202, MCA.

20. The Commissioner may suspend, revoke, refuse to renew, or refuse to issue a license under this chapter, may levy a civil penalty in accordance with 33-1-317, or may choose any combination of actions when a licensee or applicant for licensure has: in the conduct of the affairs under the license, used fraudulent, coercive, or dishonest practices or the licensee or applicant is incompetent, untrustworthy, financially irresponsible, or a source of injury and loss to the public. § 33-17-1011(1)(f), MCA.

21. On February 9, 2024, an application for a new health insurance plan was submitted using Jean-Louis's NPN number without the knowledge or consent of M.G.

22. Respondent's insurance fraud resulted in potential tax liability for M.G.

23. Creating policies for clients and impacting their taxes without their consent and knowledge violates § 33-17-1001(1)(f), MCA due to its coercive and dishonest nature.

FINAL ORDER

THEREFORE, based on the foregoing findings of fact and conclusions of law, it is hereby ORDERED that:

1. Respondent Jean-Louis committed administrative insurance fraud in violation of § 33-17-1202(3), MCA;

2. Respondent Pacecca committed administrative insurance fraud in violation of § 33-17-1202(3), MCA;

3. Respondent Jean-Louis shall pay a fine of $5,000 pursuant to Mont. Code Ann. § 33-1-317, plus interest at the statutory rate. The fine must be paid within 30 days

of the date of this Order. Payment must be made by check or money order payable to the State of Montana.

4. Respondent Pacecca shall pay a fine of $5,000 pursuant to Mont. Code Ann. § 33-1-317, plus interest at the statutory rate. The fine must be paid within 30 days of the date of this Order. Payment must be made by check or money order payable to the State of Montana.

5. Payments shall be sent to the Commissioner of Securities and Insurance, Office of the Montana State Auditor, Attn: Tiffany Hoffman, Paralegal, 840 Helena Avenue, Helena, MT 59601.

6. Respondent Jean-Louis' Insurance Producer License is hereby revoked pursuant to § 33-17-1001(1)(f), MCA; and

7. Respondent Pacecca's Insurance Producer License is hereby revoked pursuant to § 33-17-1001(1)(f), MCA.

DATED this 23rd day of July, 2026.

JAMES BROWN
Commissioner of Securities and Insurance,
Montana State Auditor

NOTICE

You are entitled to judicial review of this Order in accordance with § 2-4-702, MCA. Judicial review may be obtained by filing a petition in district court within thirty days after the service of this Order.

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2026, I caused a copy of the foregoing, *Final Agency Action and Default Order*, to be served on the following persons by U.S. Mail with tracking capability and email:

TERVELENS JEAN-LOUIS
8359 DYNASTY DRIVE
BOCA RATON, FL 33433
tjean-louis@essentialhealthgroup.com

TERVELENS JEAN-LOUIS
20940 UPTOWN AVENUE, APT 126
BOCA RATON, FL 33428
treyjean-louis7@gmail.com

JULIAN PACECCA
900 N FEDERAL HWT STE 350
BOCA RATON, FL 33432
julianpacecca@ezhealthgroup.com

JULIAN PACECCA
10402 BUENA VENTURA DRIVE
BOCA RATON, FL 33498
jpacecca2000@yahoo.com

Paralegal